

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WILDFIRE PRODUCTIONS, L.P.,)	
)	Case No. _____
Plaintiff,)	
)	
vs.)	
)	
FENWAY SPORTS GROUP, LLC and)	
FENWAY SPORTS GROUP)	
HOCKEYCO, LLC,)	
)	JURY TRIAL DEMANDED
Defendants.)	

COMPLAINT

Plaintiff Wildfire Productions, L.P. (“Plaintiff” or “Wildfire”) brings this action against Fenway Sports Group, LLC and Fenway Sports Group HockeyCo, LLC (together, “Fenway Sports Group” or “FSG”). Wildfire is a long-time limited partner of the Lemieux Group, L.P. (“Lemieux Group”), which is the limited partnership that owns the Pittsburgh Penguins Hockey Club. Wildfire asserts two causes of action against FSG: (1) aiding and abetting a breach of fiduciary duty by Team Lemieux, LLC (“Team Lemieux”), the general partner of the Lemieux Group; and (2) tortious interference with the Lemieux Group Partnership Agreement.

NATURE OF THE ACTION

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PARTIES

14. Wildfire is a Pennsylvania limited partnership with its principal place of business in the Western District of Pennsylvania. Between 1999 and 2000, Wildfire invested \$5 million in the Lemieux Group, a reorganized Pennsylvania limited partnership that took over ownership of the Pittsburgh Penguins as the team emerged from bankruptcy.

15. Wildfire is a Class B Limited Partner of the Lemieux Group. Wildfire currently owns approximately 7.54% of the Partnership.

16. Defendant Fenway Sports Group, LLC is a Delaware limited liability company with a principal place of business in Boston, Massachusetts.

17. Defendant Fenway Sports Group HockeyCo, LLC is a Delaware limited liability company with a principal place of business in Boston, Massachusetts.

JURISDICTION AND VENUE

18. The Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332(a) because, upon information and belief, Wildfire and FSG are citizens of different states and the amount in controversy exceeds \$75,000.

19. This Court has personal jurisdiction because Defendants have sufficient minimum contacts with Pennsylvania and this action arises out of Defendants' contacts with Pennsylvania. Defendants seek to assume ownership and control of the Lemieux Group, the Pennsylvania limited partnership that owns the Pittsburgh Penguins. The actions complained of herein arise from FSG's numerous and continuous contacts with and/or directed at Pennsylvania entities and residents in connection with the Proposed Transaction, including but not limited to phone calls, emails, and in-person visits to the Pittsburgh area and PPG Paints Arena, where the Penguins play their home games. The purpose of Defendants' actions was ultimately to acquire ownership and control of the Pittsburgh Penguins, a Pennsylvania-based National Hockey League Club that has played in Pittsburgh since 1967.

20. Venue is appropriate in the Western District of Pennsylvania because the transactions and occurrences giving rise to Plaintiff's causes of action took place in Pittsburgh, Pennsylvania, and the Defendants' actions took place in, and/or were purposefully targeted at, the Western District of Pennsylvania.

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COUNT I
AIDING AND ABETTING A BREACH OF FIDUCIARY DUTY
(Against All Defendants)

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COUNT II
TORTIOUS INTERFERENCE WITH A CONTRACTUAL RELATIONSHIP
(Against All Defendants)

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Dated: December 27, 2021

Respectfully submitted,

/s/ Daniel J. Stuart

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